



MONTGOMERY McCracken

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January 2, 2023

Via ECF

The Honorable Anne Y. Shields
United States Magistrate Judge
for the Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Cajilema v. Barret Roofs, Inc. et al;
Case No. 2:23-cv-00080-GRB-AYS

Dear Magistrate Judge Shields:

Our firm has been retained to represent Defendant Thomas Delaney in the above-referenced matter. We submit this joint letter with prior counsel of record, Bernard Vaughan, Esq., to respectfully request an order formally relieving Mr. Vaughan as counsel for Defendant Delaney.

Pursuant to Local Civil Rule 1.4, enclosed is an affidavit executed by Mr. Vaughan detailing the reasons for his request for withdrawal from this matter. In accordance with Local Civil Rule 1.4, this application is being served upon the Defendant Delaney and upon all other parties. A retaining or charging lien is not being asserted.

Respectfully submitted,

Kathleen M. Murphy

KMM:

Enclosures

cc: Jeffrey Robert Maguire (jmaguire@stevensonmarino.com)
Joshua T. Reitzas (jreitzas@bnrllp.com)
Bernard J. Vaughan (vaughanbjv@gmail.com)
Thomas Delancey (via Regular Mail)

MONTGOMERY McCracken WALKER & RHOADS LLP

PENNSYLVANIA • NEW YORK • NEW JERSEY • DELAWARE

A PENNSYLVANIA LIMITED LIABILITY PARTNERSHIP
MICHAEL J. FEKETE, NEW JERSEY RESPONSIBLE PARTNER

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

JOSE MANUEL CAJILEMA, on behalf of
himself and all others similarly-situated,

Plaintiff,

-v-

BARRETT ROOFS, INC., and THOMAS
DELANCEY, individually,

Defendants.

CIVIL ACTION

NO. 2:23-cv-00080-GRB-AYS

STATE OF FLORIDA)
)ss.:
COUNTY OF PALM BEACH)

Bernard J. Vaughan, an attorney duly admitted to practice law in the State of New York,
affirms under penalty of perjury as follows:

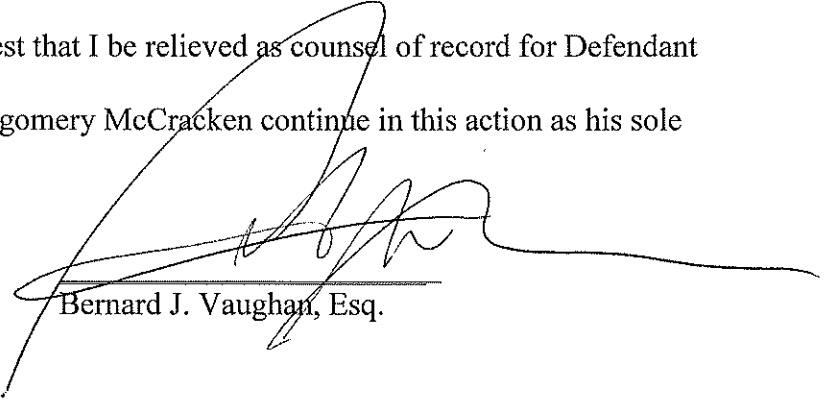
1. I am no longer maintain an active law office and am semi-retired. I live full time in Jupiter, Florida.
2. In 2022, I resigned as the Chief Legal Officer and EVP of Administration of FlexiVan Leasing where I worked for 32 years.
3. Prior to that, I was an attorney with the law firm of Haight, Gardner, Poor & Havens (now Holland & Knight) in their New York and Washington, D.C. offices.
4. I was contacted by my friend, the Defendant Thomas Delancey and agreed to appear in this action on his behalf.
5. On December 5, 2023, the law firm of Montgomery McCracken Walker & Rhoads LLP agreed to undertake the representation of Defendant Delancey and entered their appearance on the docket. Mr. Delancey is in favor of retaining the Firm and my

withdrawal as counsel.

6. Accordingly, I respectfully request that I be relieved as counsel of record for Defendant Thomas Delancey and that Montgomery McCracken continue in this action as his sole counsel.

Dated:

12/28/2023



Bernard J. Vaughan, Esq.